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|---------------------------------|---|-------------------------------|-----------------------------|
| <i>SERFF Tracking Number:</i> | <i>OXFR-128176098</i> | <i>State:</i> | <i>Arkansas</i> |
| <i>Filing Company:</i> | <i>Oxford Life Insurance Company</i> | <i>State Tracking Number:</i> | |
| <i>Company Tracking Number:</i> | <i>NSOXFIND2012MSRATE</i> | | |
| <i>TOI:</i> | <i>MS051 Individual Medicare Supplement -</i> | <i>Sub-TOI:</i> | <i>MS051.015 Multi-Plan</i> |
| | <i>Standard Plans</i> | | |
| <i>Product Name:</i> | <i>Medicare Supplement</i> | | |
| <i>Project Name/Number:</i> | <i>Medicare Supplement /</i> | | |

Filing at a Glance

| | | |
|---|------------------------------------|-------------------------------------|
| Company: Oxford Life Insurance Company | SERFF Tr Num: OXFR-128176098 | State: Arkansas |
| Product Name: Medicare Supplement | SERFF Status: Closed-Approved- | State Tr Num: |
| TOI: MS051 Individual Medicare Supplement - | Closed | |
| Standard Plans | Co Tr Num: | State Status: Approved-Closed |
| Sub-TOI: MS051.015 Multi-Plan | NSOXFIND2012MSRATE | |
| Filing Type: Rate | Authors: Ryan MacTough, Pat O'Hara | Reviewer(s): Stephanie Fowler |
| | Date Submitted: 03/15/2012 | Disposition Date: 04/23/2012 |
| | | Disposition Status: Approved-Closed |
| Implementation Date Requested: 07/01/2012 | | Implementation Date: 04/23/2012 |
| State Filing Description: | | |

General Information

| | |
|--|---------------------------------------|
| Project Name: Medicare Supplement | Status of Filing in Domicile: |
| Project Number: | Date Approved in Domicile: |
| Requested Filing Mode: Review & Approval | Domicile Status Comments: |
| Explanation for Combination/Other: | Market Type: Individual |
| Submission Type: New Submission | Individual Market Type: |
| Overall Rate Impact: 19.96% | Filing Status Changed: 04/23/2012 |
| | State Status Changed: 04/23/2012 |
| Deemer Date: | Created By: Ryan MacTough |
| Submitted By: Ryan MacTough | Corresponding Filing Tracking Number: |
| Filing Description: | |
| February 21, 2012 | |

To Whom It May Concern:

Please note that Oxford Life Insurance Company purchased the National States Insurance Company Medicare Supplement block in 2010. We have given the Oxford NAIC and FEIN number since Oxford owns this block, and to provide continuity with all filings going forward.

SERFF Tracking Number: OXFR-128176098 State: Arkansas
Filing Company: Oxford Life Insurance Company State Tracking Number:
Company Tracking Number: NSOXFIND2012MSRATE
TOI: MS051 Individual Medicare Supplement - Sub-TOI: MS051.015 Multi-Plan
Standard Plans
Product Name: Medicare Supplement
Project Name/Number: Medicare Supplement /

The enclosed Pre-Standard Medicare Supplement rate filing is being submitted for your review and approval. We are requesting a rate increase based on experience and the increase in Medicare deductibles for the following forms:

ASM1
DSM1
FSM1
FSM3
JSM3

The submitted rates fulfill the annual filing requirement for 2012.

If you have any additional questions regarding this filing, please feel free to contact me.

Sincerely,

Patrick O'Hara
Regulatory Compliance Analyst
602.263.6666 extension 670130
patohara@oxfordlife.com
State Narrative:

Company and Contact

Filing Contact Information

Pat O'Hara, Regulatory Compliance Analyst PatO'Hara@Oxfordlife.com
2721 N. Central Ave. 602-263-6666 [Phone] 670130
[Ext]

Phoenix, AZ 85004

Filing Company Information

| | | |
|-------------------------------|-------------------------|----------------------------|
| Oxford Life Insurance Company | CoCode: 76112 | State of Domicile: Arizona |
| 2721 N. Central Avenue | Group Code: | Company Type: |
| Phoenix, AZ 85004-1172 | Group Name: | State ID Number: |
| (888) 757-3732 ext. [Phone] | FEIN Number: 86-0216483 | |

Filing Fees

| COMPANY | AMOUNT | DATE PROCESSED | TRANSACTION # |
|-------------------------------|---------|----------------|---------------|
| Oxford Life Insurance Company | \$50.00 | 03/15/2012 | 57186297 |

SERFF Tracking Number: OXFR-128176098 State: Arkansas

Filing Company: Oxford Life Insurance Company State Tracking Number:

Company Tracking Number: NSOXFIND2012MSRATE

TOI: MS051 Individual Medicare Supplement - Sub-TOI: MS051.015 Multi-Plan
Standard Plans

Product Name: Medicare Supplement

Project Name/Number: Medicare Supplement /

Correspondence Summary

Dispositions

| Status | Created By | Created On | Date Submitted |
|-----------------|------------------|------------|----------------|
| Approved-Closed | Stephanie Fowler | 04/23/2012 | 04/23/2012 |

Objection Letters and Response Letters

| Objection Letters | | | | Response Letters | | |
|---------------------------|------------------|------------|----------------|------------------|------------|----------------|
| Status | Created By | Created On | Date Submitted | Responded By | Created On | Date Submitted |
| Pending Industry Response | Stephanie Fowler | 03/27/2012 | 03/27/2012 | Pat O'Hara | 03/28/2012 | 03/28/2012 |

Filing Notes

| Subject | Note Type | Created By | Created On | Date Submitted |
|--------------|------------------|---------------|------------|----------------|
| Resubmission | Note To Reviewer | Ryan MacTough | 03/15/2012 | 03/15/2012 |

| | | | |
|--------------------------|---|------------------------|----------------------|
| SERFF Tracking Number: | OXFR-128176098 | State: | Arkansas |
| Filing Company: | Oxford Life Insurance Company | State Tracking Number: | |
| Company Tracking Number: | NSOXFIND2012MSRATE | | |
| TOI: | MS051 Individual Medicare Supplement - Standard Plans | Sub-TOI: | MS051.015 Multi-Plan |
| Product Name: | Medicare Supplement | | |
| Project Name/Number: | Medicare Supplement / | | |

Disposition

Disposition Date: 04/23/2012

Implementation Date: 04/23/2012

Status: Approved-Closed

Comment: The requested rate increase of 20% has been approved for Plans F and J. No increase was requested, nor approved for any other Plan. This approval is subject to the following:

- Increases will not be given more frequently than once in a twelve-month period;
- The insured shall be notified by the insurer of its intention to increase the rate for renewal not less than thirty (30) days prior to the effective date of the renewal.

| Company Name: | Overall % Indicated Change: | Overall % Rate Impact: | Written Premium Change for this Program: | # of Policy Holders Affected for this Program: | Written Premium for this Program: | Maximum % Change (where required): | Minimum % Change (where required): |
|----------------------------------|-----------------------------------|---------------------------|--|---|---|--|--|
| Oxford Life Insurance Company | 19.960% | 19.960% | \$471,591 | 1,533 | \$2,362,680 | 19.960% | 19.960% |

| Schedule | Schedule Item | Schedule Item Status | Public Access |
|---------------------|---------------------------------------|----------------------|---------------|
| Supporting Document | Health - Actuarial Justification | Approved-Closed | No |
| Supporting Document | Response to Submission OXFR-128106765 | Approved-Closed | No |
| Supporting Document | Response Letter 3/28/2012 | Approved-Closed | No |
| Rate | Medicare Supplement | Approved-Closed | Yes |

SERFF Tracking Number: OXFR-128176098 *State:* Arkansas
Filing Company: Oxford Life Insurance Company *State Tracking Number:*
Company Tracking Number: NSOXFIND2012MSRATE
TOI: MS051 Individual Medicare Supplement - *Sub-TOI:* MS051.015 Multi-Plan
Standard Plans
Product Name: Medicare Supplement
Project Name/Number: Medicare Supplement /

Objection Letter

Objection Letter Status Pending Industry Response
Objection Letter Date 03/27/2012
Submitted Date 03/27/2012
Respond By Date 04/27/2012

Dear Pat O'Hara,

After further review of this request, we would be willing to approve a 5% rate increase on this block of business; this offer is made in lieu of disapproval.

A.C.A. 23-79-109(1)-(5) sets forth the procedure by which filings may be deemed approved upon the expiration of certain time periods with no affirmative action by the commissioner. If the commissioner determines that additional information is needed to make a decision regarding approval, such request for information will be made to the company. The filing will not be considered complete until said additional information is received. The time periods set forth in this statute will not begin to run until the filing is complete.

Please feel free to contact me if you have questions.

Sincerely,
Stephanie Fowler

SERFF Tracking Number: OXFR-128176098 State: Arkansas
Filing Company: Oxford Life Insurance Company State Tracking Number:
Company Tracking Number: NSOXFIND2012MSRATE
TOI: MS051 Individual Medicare Supplement - Sub-TOI: MS051.015 Multi-Plan
Standard Plans
Product Name: Medicare Supplement
Project Name/Number: Medicare Supplement /

Response Letter

Response Letter Status Submitted to State
Response Letter Date 03/28/2012
Submitted Date 03/28/2012

Dear Stephanie Fowler,

Comments:

Response 1

Comments: Please see our 3/28/12 response letter attached to the Supporting Documents tab.

Thank you.

Patrick O'Hara

Changed Items:

Supporting Document Schedule Item Changes

Satisfied -Name: Response Letter 3/28/2012

Comment:

No Form Schedule items changed.

No Rate/Rule Schedule items changed.

Sincerely,
Pat O'Hara, Ryan MacTough

Note To Reviewer

Ryan MacTough on 03/15/2012 07:42 PM

Stephanie Fowler

04/23/2012 04:29 PM

Resubmission

Note: this is re-submission of filing OXFR-128106765 that was closed and disapproved on March 15, 2012. There appears to be a misunderstanding as to how many rate increases have been applied to these policyholders. Please see the attached letter in the Supporting Documents tab for further clarification.

Ryan MacTough
Oxford Life Insurance Company

| | | | |
|--------------------------|---|------------------------|----------------------|
| SERFF Tracking Number: | OXFR-128176098 | State: | Arkansas |
| Filing Company: | Oxford Life Insurance Company | State Tracking Number: | |
| Company Tracking Number: | NSOXFIND2012MSRATE | | |
| TOI: | MS051 Individual Medicare Supplement - Standard Plans | Sub-TOI: | MS051.015 Multi-Plan |
| Product Name: | Medicare Supplement | | |
| Project Name/Number: | Medicare Supplement / | | |

Rate Information

Rate data applies to filing.

| | |
|--|------------|
| Filing Method: | SERFF |
| Rate Change Type: | Increase |
| Overall Percentage of Last Rate Revision: | 10.000% |
| Effective Date of Last Rate Revision: | 07/01/2011 |
| Filing Method of Last Filing: | SERFF |

Company Rate Information

| Company Name: | Overall % Indicated Change: | Overall % Rate Impact: | Written Premium Change for this Program: | # of Policy Holders Affected for this Program: | Written Premium for this Program: | Maximum % Change (where required): | Minimum % Change (where required): |
|----------------------------------|-----------------------------------|---------------------------|---|---|---|--|--|
| Oxford Life Insurance Company | 19.960% | 19.960% | \$471,591 | 1,533 | \$2,362,680 | 19.960% | 19.960% |

SERFF Tracking Number: OXFR-128176098 State: Arkansas

Filing Company: Oxford Life Insurance Company State Tracking Number:

Company Tracking Number: NSOXFIND2012MSRATE

TOI: MS051 Individual Medicare Supplement - Sub-TOI: MS051.015 Multi-Plan
Standard Plans

Product Name: Medicare Supplement

Project Name/Number: Medicare Supplement /

Rate/Rule Schedule

| Schedule Item Status: | Document Name: | Affected Form Numbers: (Separated with commas) | Rate Action: | Rate Action Information: | Attachments |
|-------------------------------|---------------------|---|--------------|--------------------------|--|
| Approved-Closed 04/23/2012 | Medicare Supplement | ASM1, DSM3, FSM1, FSM3, JSM3 | New | | Exhibit I - Current and Proposed Rates.pdf |

ANNUAL PREMIUM RATES

Company: Oxford Life Insurance Company (formerly National States)
 Policy Type: Standardized Medicare Supplement
 State: Arkansas
 Date Prepared: 02/11/12

| Issue Age Band | Current Annual Premiums | | |
|-------------------|-------------------------|----------|----------|
| | ASM-1 | BSM-1 | FSM-1 |
| All Ages | \$ 2,224 | \$ 3,363 | \$ 3,602 |

Requested
 Rate
 Increase

| | | |
|------|------|------|
| 0.0% | 0.0% | 0.0% |
|------|------|------|

| Issue Age Band | Requested Annual Premiums | | |
|-------------------|---------------------------|----------|----------|
| | ASM-1 | BSM-1 | FSM-1 |
| All Ages | \$ 2,224 | \$ 3,363 | \$ 3,602 |

Modal Premium Factors

Semiannual $[(\text{Annual} * 1.03) + \$1] / 2$
 Quarterly $[(\text{Annual} * 1.06) + \$3] / 4$
 Monthly $[(\text{Annual} * 1.08) + \$11] / 12$

| ARKANSAS PREMIUM RATES FOR OXFORD LIFE PLAN D ZIP REGION: 722, 723 Current Rates | | | | ARKANSAS PREMIUM RATES FOR OXFORD LIFE PLAN D ZIP REGION: 722, 723 Proposed Rates | | |
|---|------------------|--------------|-------------------|--|------------------|--------------|
| ISSUE AGE | NON-SMOKER RATES | SMOKER RATES | Proposed Increase | ISSUE AGE | NON-SMOKER RATES | SMOKER RATES |
| All Ages | \$1,568.00 | \$1,882.00 | 0.00% | All Ages | \$1,568.00 | \$1,882.00 |
| ARKANSAS PREMIUM RATES FOR OXFORD LIFE PLAN D ZIP REGION: 727 Current Rates | | | | ARKANSAS PREMIUM RATES FOR OXFORD LIFE PLAN D ZIP REGION: 727 Proposed Rates | | |
| ISSUE AGE | NON-SMOKER RATES | SMOKER RATES | Proposed Increase | ISSUE AGE | NON-SMOKER RATES | SMOKER RATES |
| All Ages | \$1,411.00 | \$1,694.00 | 0.00% | All Ages | \$1,411.00 | \$1,694.00 |
| | | | 90% | | | |
| ARKANSAS PREMIUM RATES FOR OXFORD LIFE PLAN D ZIP REGION: All Others Not Shown Above Current Rates | | | | ARKANSAS PREMIUM RATES FOR OXFORD LIFE PLAN D ZIP REGION: All Others Not Shown Above Proposed Rates | | |
| ISSUE AGE | NON-SMOKER RATES | SMOKER RATES | Proposed Increase | ISSUE AGE | NON-SMOKER RATES | SMOKER RATES |
| All Ages | \$1,254.00 | \$1,506.00 | 0.00% | All Ages | \$1,254.00 | \$1,506.00 |
| | | | 80% | | | |

| ARKANSAS PREMIUM RATES FOR OXFORD LIFE PLAN F ZIP REGION: 722, 723 Current Rates | | | |
|---|------------------|--------------|-------------------|
| ISSUE AGE | NON-SMOKER RATES | SMOKER RATES | Proposed Increase |
| All Ages | \$1,863.00 | \$2,236.00 | 20.00% |

| ARKANSAS PREMIUM RATES FOR OXFORD LIFE PLAN F ZIP REGION: 722, 723 Proposed Rates | | |
|--|------------------|--------------|
| ISSUE AGE | NON-SMOKER RATES | SMOKER RATES |
| All Ages | \$2,236.00 | \$2,683.00 |

| ARKANSAS PREMIUM RATES FOR OXFORD LIFE PLAN F ZIP REGION: 727 Current Rates | | | |
|--|------------------|--------------|-------------------|
| ISSUE AGE | NON-SMOKER RATES | SMOKER RATES | Proposed Increase |
| All Ages | \$1,677.00 | \$2,012.00 | 20.00% |
| | | | 90% |

| ARKANSAS PREMIUM RATES FOR OXFORD LIFE PLAN F ZIP REGION: 727 Proposed Rates | | |
|---|------------------|--------------|
| ISSUE AGE | NON-SMOKER RATES | SMOKER RATES |
| All Ages | \$2,012.00 | \$2,415.00 |

| ARKANSAS PREMIUM RATES FOR OXFORD LIFE PLAN F ZIP REGION: All Other Not Shown Above Current Rates | | | |
|--|------------------|--------------|-------------------|
| ISSUE AGE | NON-SMOKER RATES | SMOKER RATES | Proposed Increase |
| All Ages | \$1,490.00 | \$1,789.00 | 20.00% |
| | | | 80% |

| ARKANSAS PREMIUM RATES FOR OXFORD LIFE PLAN F ZIP REGION: All Other Not Shown Above Proposed Rates | | |
|---|------------------|--------------|
| ISSUE AGE | NON-SMOKER RATES | SMOKER RATES |
| All Ages | \$1,789.00 | \$2,146.00 |

| ARKANSAS PREMIUM RATES FOR OXFORD LIFE PLAN J ZIP REGION: 722, 723 Current Rates | | | |
|---|------------------|--------------|-------------------|
| ISSUE AGE | NON-SMOKER RATES | SMOKER RATES | Proposed Increase |
| All Ages | \$1,902.00 | \$2,283.00 | 20.00% |

| ARKANSAS PREMIUM RATES FOR OXFORD LIFE PLAN J ZIP REGION: 722, 723 Proposed Rates | | |
|--|------------------|--------------|
| ISSUE AGE | NON-SMOKER RATES | SMOKER RATES |
| All Ages | \$2,282.00 | \$2,740.00 |

| ARKANSAS PREMIUM RATES FOR OXFORD LIFE PLAN J ZIP REGION: 727 Current Rates | | | |
|--|------------------|--------------|-------------------|
| ISSUE AGE | NON-SMOKER RATES | SMOKER RATES | Proposed Increase |
| All Ages | \$1,712.00 | \$2,055.00 | 20.00% |
| | | | 90% |

| ARKANSAS PREMIUM RATES FOR OXFORD LIFE PLAN J ZIP REGION: 727 Proposed Rates | | |
|---|------------------|--------------|
| ISSUE AGE | NON-SMOKER RATES | SMOKER RATES |
| All Ages | \$2,054.00 | \$2,466.00 |

| ARKANSAS PREMIUM RATES FOR OXFORD LIFE PLAN J ZIP REGION: All Other Not Shown Above Current Rates | | | |
|--|------------------|--------------|-------------------|
| ISSUE AGE | NON-SMOKER RATES | SMOKER RATES | Proposed Increase |
| All Ages | \$1,522.00 | \$1,826.00 | 20.00% |
| | | | 80% |

| ARKANSAS PREMIUM RATES FOR OXFORD LIFE PLAN J ZIP REGION: All Other Not Shown Above Proposed Rates | | |
|---|------------------|--------------|
| ISSUE AGE | NON-SMOKER RATES | SMOKER RATES |
| All Ages | \$1,826.00 | \$2,192.00 |